

FILED
JOHN P. HEHMAN
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

2015 JAN 21 PM 12:29

U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

Case No.

1:15CR 012

v.

INDICTMENT

BECKWITH

CHRISTOPHER CORNELL

(a/k/a Raheel Mahrus Ubaydah)

18 U.S.C. § 373

18 U.S.C. § 924(c)

18 U.S.C. § 1114

The Grand Jury alleges the following:

COUNT 1

(Attempted Murder of Government Employees and Officials)

18 U.S.C. § 1114

1. On or about August 2014 through January 2015, in the Southern District of Ohio and elsewhere, **Defendant CHRISTOPHER CORNELL**, did attempt to unlawfully kill officers and employees of the United States while such officers and employees of the United States were engaged in and on account of the performance of their official duties, specifically, by attempting to attack the United States Capitol Building and kill officers and employees of the United States.

All in violation of Title 18, United States Code, Section 1114.

COUNT 2

(Solicitation to Commit a Crime of Violence)

18 U.S.C. § 373

2. On or about August 2014 through January 2015, in the Southern District of Ohio and elsewhere, **Defendant CHRISTOPHER CORNELL**, with intent that another person engage in conduct constituting a felony that has as an element the

use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicited, commanded, induced, and otherwise endeavored to persuade such other person to engage in such conduct, specifically, the killing of officers and employees of the United States, in violation of Title 18, United States Code, Section 1114.

All in violation of Title 18, United States Code, Section 373.

COUNT 3

**(Possession of Firearm in Furtherance of Attempted Crime of Violence)
18 U.S.C. § 924(c)**

3. On or about January 14, 2015, in the Southern District of Ohio and elsewhere, **Defendant CHRISTOPHER CORNELL** did knowingly possess a firearm, that is, two Armalite Inc., Model M-15, 5.56mm, semi-automatic rifles (Serial numbers MS000788B and MS000974A) and approximately 600 rounds of ammunition, in furtherance of an attempted crime of violence for which he may be prosecuted in a court of the United States, that is the attempted killing of officers and employees of the United States, in violation of Title 18, United States Code, Section 1114.

All in violation of Title 18, United States Code, Section 924(c).

FORFEITURE ALLEGATION

4. The allegations contained in Count 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).
5. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c) set forth in Count 3 of this Indictment, the **Defendant**, **CHRISTOPHER CORNELL**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to: two Armalite Inc., Model M-15, 5.56mm, semi-automatic rifles (Serial numbers MS000788B and MS000974A) and approximately 600 rounds of ammunition.
6. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

A TRUE BILL.

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Grand Jury Foreperson

CARTER M. STEWART
United States Attorney

Carter M. Stewart

ANTHONY SPRINGER
Cincinnati Branch Chief